

**IN THE UNITED STATES BANKRUPTCY COURT FOR THE
SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION**

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|--------------------------------|---|-------------------|
| IN RE: | § | CASE NO. 25-30155 |
| | § | |
| ALLIANCE FARM AND RANCH, LLC, | § | (CHAPTER 11) |
| | § | |
| DEBTOR | § | |
| | § | |
| IN RE: | § | CASE NO. 25-31937 |
| | § | |
| ALLIANCE ENERGY PARTNERS, LLC, | § | (CHAPTER 11) |
| | § | |
| DEBTOR | § | |
| | § | |

**SECOND STIPULATION AND AGREED ORDER
EXTENDING THE OBJECTION DEADLINE REGARDING
APPLICATION FOR APPROVAL OF EMPLOYMENT OF OKIN ADAMS
BARTLETT CURRY, LLP AS COUNSEL FOR DEBTORS AND
APPLICATION FOR COMPENSATION AND REIMBURSEMENT OF
EXPENSES FOR THE PERIODS MARCH 14, 2025 THROUGH MAY 23, 2025
(ALLIANCE FARM AND RANCH, LLC) AND APRIL 7, 2025 THROUGH
MAY 23, 2025 (ALLIANCE ENERGY PARTNERS, LLC)
[Related to Doc No. 130]**

This Second Stipulation (“Stipulation”) is entered into by (a) Tom A. Howley in his capacity as the chapter 11 trustee (the “Trustee”) in the above-numbered and styled bankruptcy proceedings; and (b) Okin Adams Bartlett Curry, LLP (“Okin Adams”) (together the “Parties”). The Parties hereby stipulate and agree as follows:

WHEREAS, the Trustee was appointed on May 27, 2025 at Docket No. 115.

WHEREAS, on June 4, 2025 Okin Adams filed its *Application for Approval of Employment of Okin Adams Bartlett Curry, LLP as Counsel for Debtors and Application for Compensation and Reimbursement of Expenses for the Periods March 14, 2025 Through May 23, 2025 (Alliance Farm and Ranch, LLC) and April 7, 2025 Through May 23, 2025 (Alliance Energy Partners, LLC)* (the “Application”).

WHEREAS, the deadline to object to the Application was June 25, 2025 (“Objection Deadline”).

WHEREAS, the Parties have been engaging in discussions relating to a possible resolution of any objections to the Application. The Court entered the first Stipulation and Agreed Order extending the deadline to July 9, 2025, at Docket No. 140. The Parties have agreed to further extend the Objection Deadline for the Parties to this Stipulation.

WHEREAS, the Parties have agreed that the Objection Deadline should be extended to July 16, 2025 (“Extended Objection Deadline”) for the Parties to this Stipulation.

NOW, THEREFORE, the Parties hereby stipulate and agree and it is **ORDERED** that:

1. The foregoing recitals are hereby incorporated by reference into this Stipulation with the same force and effect as if fully set forth hereinafter.
2. Unless otherwise agreed to by the parties by separate stipulation, the Extended Objection Deadline of July 16, 2025 shall be the objection deadline for the Parties to this Stipulation regarding Okin Adam’s Application.
3. The provisions of this Stipulation shall be binding on the Parties and their successors, heirs, and assigns and shall inure to the benefit of the Parties and their successors and assigns.
4. Each person who executes this Stipulation on behalf of a Party hereto represents that he or she is duly authorized to execute this Stipulation and agrees to the terms set forth herein.
5. This Stipulation shall be effective and enforceable immediately upon entry of this Stipulation, in accordance with its terms.

6. The Bankruptcy Court retains jurisdiction with respect to the implementation of this Stipulation, and the Parties hereby consent to such jurisdiction to resolve any disputes or controversies with respect to this Stipulation.

Signed: _____, 2025
Houston, Texas

ALFREDO R. PEREZ
UNITED STATES BANKRUPTCY JUDGE

Dated: July 8, 2025

/s/ Eric Terry

Eric Terry

Texas Bar No. 00794729

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**Proposed Counsel for Tom A. Howley –
Trustee**

- and -

**OKIN ADAMS BARTLETT CURRY
LLP**

/s/ Timothy L. Wentworth

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Proposed Attorneys for the Debtor

CERTIFICATE OF SERVICE

I certify that on June 8, 2025, I caused a copy of the foregoing document to be served by electronic transmission to all registered ECF users appearing in these cases.

/s/ Eric Terry

Eric Terry